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(incorrectly named as Citigroup, Inc. (dba
"Citibank"))*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

INJURYLOANS.COM, LLC, a Nevada entity;
ADAM STOKES, an individual,

Plaintiff,

v.

SERGIO BUENROSTRO, an individual;
CITIGROUP, INC. (dba "Citibank"), an entity.

Defendants.

Case No.: 2:18-cv-01926-GMN-VCF

**STIPULATION AND ORDER TO REOPEN
EXPERT DISCLOSURE DEADLINE**

[FIRST REQUEST]

AND RELATED CLAIMS

Defendant/Third-Party Plaintiff Citibank, N.A. (**Citi**), Plaintiff/Counter-Defendants Injuryloans.com, LLC and Adam Stokes (**Plaintiffs**), Defendant/Counter-Claimant/Third Party Defendant Sergio Buenrostro (**Buenrostro**) and Third-Party Defendant S&S Marketing Consulting, LLC (**S&S**), by and through their respective counsel of record, stipulate the deadline for Citi to make its initial expert disclosure, shall be reopened to **Friday, April 17, 2020**.

This deadline is currently closed, having not been reopened since the parties' initial discovery period. The current operative expert deadline expired in June 2019 (during the discovery period when Citi was advised plaintiffs were not seeking liability against it and had no reason to retain an

expert witness). Since that time, new parties have been added, claims have potentially changed and discovery has been further developed.

Plaintiffs, Buenrostro and S&S will have until **Friday, May 15, 2020** to disclose any rebuttal expert witness they may have. At this time, Plaintiffs, Buenrostro and S&S do not anticipate retaining a rebuttal expert but, to the extent they do not retain a rebuttal expert, they reserve all substantive objections to the admissibility of Citi's expert disclosure.

DATED March 13th, 2020.

<p>AKERMAN LLP</p> <p><u>/s/ Donna M. Wittig</u> ARIEL E. STERN, ESQ. Nevada Bar No. 8276 DONNA M. WITTIG, ESQ. Nevada Bar No. 11015 1635 Village Center Circle, Suite 200 Las Vegas, Nevada 89144</p> <p><i>Attorneys for defendant/third-party- Plaintiff Citibank, N.A. (incorrectly named as Citigroup, Inc. (dba "Citibank"))</i></p>	<p>LAW OFFICE OF KARL ANDERSEN, PC</p> <p><u>/s/ Karl J. Andersen</u> KARL J. ANDERSEN, ESQ. Nevada Bar No. 10306 5550 Painted Mirage Road, Suite 320 Las Vegas, Nevada 89149</p> <p>GALLAGHER LAW, PC KATHLEEN H. GALLAGHER, ESQ. Nevada Bar No. 15043 1850 East Sahara Avenue, Suite 107 Las Vegas, Nevada 89104</p> <p><i>Attorney for Plaintiffs/counterdefendants Injuryloans.com LLC and Adam Stokes</i></p>
<p>HOGAN HULET PLLC</p> <p><u>/s/ Kenneth E. Hogan</u> KENNETH E. HOGAN, ESQ. Nevada Bar No. 10083 JEFFREY L. HULET, ESQ. Nevada Bar No. 10621 1140 N. Town Center Dr., Suite 300 Las Vegas, NV 89144</p> <p><i>Attorneys for defendant/counter-claimant/third- party defendant Sergio Buenrostro and third- party defendant S&S Marketing Consulting LLC</i></p>	

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE
3-13-2020

DATED: _____